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December 2, 2020

Hon. Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

**Re: *Beat the Streets Wrestling, Inc., v. Arthur J Gallagher Risk Management Services, Inc.*,  
Case No. 20-CV-7265 (RA), Request for Extension of Time**

Dear Judge Abrams:

This firm represents Defendant Arthur J. Gallagher Risk Management Services, Inc. (“Gallagher”) in the above-referenced matter. We write pursuant to Local Rule 7.1(d), and your Honor’s Individual Rule 1.D, to request an extension of Gallagher’s time to answer, move or otherwise respond to the Complaint (ECF No.1). The original due date for Gallagher to respond was September 30, 2020. On September 28, 2020, the Court granted Gallagher’s first request for an extension to November 9, 2020 (ECF No. 12). On November 5, 2020, the Court granted Gallagher’s second request for an extension to December 10, 2020 (ECF No. 16). Currently, the parties are engaged in settlement negotiations, and need more time to explore if the case can be resolved without further litigation. Therefore, Gallagher respectfully requests that the Court extend the deadline for Gallagher to answer, move or otherwise respond to the Complaint to January 11, 2021. This is Gallagher’s third request for an extension.

In addition, the parties’ joint status letter, proposed case management plan, and scheduling order are due on December 15, 2020, and the parties’ initial status conference is set for December 22, 2020 at 11:15 am (ECF No. 16). Gallagher respectfully requests that the Court extend the deadline for the parties’ joint status letter, proposed case management plan, and scheduling order to January 15, 2021, and reschedule the initial status conference to a date on or after January 21, 2021. This is Gallagher’s second request for an extension of these deadlines.

Plaintiff does not object to these extensions. Counsel for both parties have been in discussions about this case and have agreed to the proposed extensions.

Thank you in advance for the Court’s attention to this letter motion. Please let us know if the Court needs any additional information to grant the extension. Gallagher respectfully requests that the Court approve the requested extension of time by endorsing this letter-motion.

Respectfully submitted,



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s/ Luke A. Connelly

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cc: All Counsel of Record (via ECF)

Application granted. The deadline for Gallagher to answer, move or otherwise respond to the Complaint is extended to January 11, 2021. The telephone status conference scheduled for December 22, 2020 is hereby adjourned to January 29, 2021 at 2:30 p.m. The parties' joint status letter and proposed case management plan shall be due on January 22, 2021.

SO ORDERED.

A handwritten signature in black ink, appearing to be "RA", written over a horizontal line.

Hon. Ronnie Abrams  
12/3/2020